

FILED
 UNITED STATES DISTRICT COURT
 ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

SEP 22 2015

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN
 CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH RAY MENDIOLA,
 FRANCISCO FERNANDO AGUILAR-
 LARIOS,
 RODNEY BOUGHTON,
 JAMES H. LEWIS,
 STEPHANIE LEYBA,
 LOUIS ESCOBAR,
 SERGIO URETA-CASTRO,
 JONATHAN URETA-LOPEZ,
 GERALD SENTELL,
 SUSANA CEBALLOS, a.k.a. "Rita,"
 ANA SOLIS,
 DESTINY STEPHENSON,
 TY LIVINGSTON,
 ISMAEL MOLINA,
 CIPRIANO ANAYA, and
 CHRISTOPHER BERNARD LAREZ,

Defendants.

CRIMINAL NO. 15-3386RB

Count 1: 21 U.S.C. § 846: Conspiracy;

Count 2: 21 U.S.C. § 846: Conspiracy;

Count 3: 21 U.S.C. §§ 841(a)(1) and
 (b)(1)(B): Possession With Intent to
 Distribute 50 Grams and More of a Mixture
 and Substance Containing
 Methamphetamine; 18 U.S.C. § 2: Aiding
 and Abetting;

Counts 4-7: 21 U.S.C. §§ 841(a)(1) and
 (b)(1)(A): Possession with Intent to
 Distribute 500 Grams and More of a
 Mixture and Substance Containing
 Methamphetamine; 18 U.S.C. § 2: Aiding
 and Abetting;

Counts 8-24: 21 U.S.C. § 843(b): Use of a
 Communication Facility to Further the
 Commission of a Drug Trafficking Crime.

INDICTMENT

The Grand Jury charges:

Count 1

From on or about June 2015, and continuing to on or about July 31, 2015, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **JOSEPH RAY MENDIOLA, FRANCISCO FERNANDO AGUILAR-LARIOS, RODNEY BOUGHTON, JAMES H. LEWIS, STEPHANIE LEYBA, LOUIS ESCOBAR, SERGIO URETA-CASTRO, JONATHAN URETA-LOPEZ, GERALD SENTELL,**

SUSANA CEBALLOS, a.k.a. "Rita," ANA SOLIS, DESTINY STEPHENSON, TY LIVINGSTON, CIPRIANO ANAYA, and CHRISTOPHER BERNARD LAREZ, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense against the United States, specifically, distribution of a controlled substance, a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 841(a)(1).

Quantity of Methamphetamine Involved in the Conspiracy

With respect to **JOSEPH RAY MENDIOLA, FRANCISCO FERNANDO AGUILAR-LARIOS, RODNEY BOUGHTON, LOUIS ESCOBAR, SERGIO URETA-CASTRO, JONATHAN URETA-LOPEZ, GERALD SENTELL, SUSANA CEBALLOS, a.k.a. "Rita," ANA SOLIS, TY LIVINGSTON, and CHRISTOPHER BERNARD LAREZ,** the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 841(b)(1)(A).

In furtherance of the conspiracy, and to accomplish the objectives of the conspiracy, the following acts, among others, were committed:

Overt Act One

On June 13, 2015, a man told Gerald Sentell that he needed additional methamphetamine, and Sentell asked the man if he wanted Sentell to deliver it to him.

Overt Act Two

On June 14, 2015, the man sent a text message to Gerald Sentell stating, "Hey I need two more."

Overt Act Three

On June 15, 2015, at 2:19 p.m., Gerald Sentell agreed to travel to Rodney Boughton's residence to pick up methamphetamine.

Overt Act Four

On June 16, 2015, Joseph Ray Mendiola and Gerald Sentell discussed how Mendiola could obtain a pound of methamphetamine from his source of supply in Albuquerque, New Mexico for \$7,500, while Sentell could obtain a pound of methamphetamine from Rodney Boughton in Roswell, New Mexico for \$8,250 to \$8,500.

Overt Act Five

On July 14, 2015, at 6:22 a.m., Susana Ceballos and Alex LNU discussed the fact that methamphetamine had arrived in Phoenix, Arizona after it crossed the border and that she needed to tell her guy to get the money ready to purchase methamphetamine.

Overt Act Six

On July 14, 2015, at 9:01 p.m., Susana Ceballos sent Joseph Ray Mendiola a text message that said, "Joe I got more cash if u need it k."

Overt Act Seven

On July 15, 2015, at 9:07 a.m., Susana Ceballos and Joseph Ray Mendiola discussed whether Mendiola had any narcotics. Mendiola responded that he had a little bit and told Ceballos that he was staying in room 306 of the Comfort Suites and that she could meet him there.

Overt Act Eight

On July 16, 2015, Joseph Ray Mendiola arranged with Louis Escobar the delivery of two quarter pounds of methamphetamine from Jonathan Ureta-Lopez in Roswell, New Mexico.

Overt Act Nine

On July 16, 2015, Joseph Ray Mendiola and Jonathan Ureta-Lopez exchanged a series of text messages from approximately 1:13 p.m. to 3:06 p.m. in which Mendiola arranged to meet Ureta-Lopez at Ureta-Lopez's residence to purchase methamphetamine.

Overt Act Ten

On July 16, 2016, Joseph Ray Mendiola and Jonathan Ureta-Lopez continued to exchange text messages after Mendiola departed Ureta-Lopez's residence. Ureta said, "Its 4461," and Mendiola responded that he would get Ureta the remaining \$39 shortly.

Overt Act Eleven

On July 17, 2015, from approximately 8:30 p.m. to 8:54 p.m., Joseph Ray Mendiola and Louis Escobar discussed Mendiola keeping Escobar updated every time Mendiola received a load of narcotics so that Escobar could keep track. Mendiola replied that he got two the other day. Escobar, using narcotics code words, asked Mendiola if he received two quarter pounds that would equal eight ounces. Mendiola replied, "Yes 2 quarters."

Overt Act Twelve

On July 17, 2015, at 3:59 p.m., Susana Ceballos, Joseph Ray Mendiola, and Alex LNU discussed how much money Ceballos and Mendiola had because a third party was arriving in Roswell to deliver methamphetamine.

Overt Act Thirteen

On July 17, 2015, at 4:07 p.m., Susana Ceballos sent a text message to Joseph Ray Mendiola that said, "the eagle has landed." Mendiola replied that he was on his way.

Overt Act Fourteen

On July 17, 2015, Susana Ceballos told Alex LNU that Joseph Ray Mendiola had \$3,000. Alex LNU told Ceballos that he would instruct the drug courier to deliver the narcotics to them and to make arrangements with the courier.

Overt Act Fifteen

On July 17, 2015, at 5:30 p.m., an unknown male delivered methamphetamine to Joseph Ray Mendiola at the Comfort Suites.

Overt Act Sixteen

On July 17, 2015, at 6:52 p.m., Joseph Ray Mendiola told another man to visit him because he was having a "garage sale" after Mendiola received a supply of methamphetamine.

Overt Act Seventeen

On July 17, 2015, at 7:23 p.m., Susana Ceballos asked Alex LNU when they could get more methamphetamine and said that she and Joseph Ray Mendiola had \$5,000. Alex LNU said that two pounds of methamphetamine had been delivered to them already and that more would come in three days and that they should collect more money.

Overt Act Eighteen

On July 17, 2015, at 3:40 p.m., Destiny Stephenson drove a black Chevrolet Avalanche to Gerald Sentell's residence in Dexter, New Mexico to pick up 58.5 grams of methamphetamine from Sentell.

Overt Act Nineteen

On July 18, 2015, at 3:17 a.m., a man sent a text message to Joseph Ray Mendiola that stated, he heard "destiny got caught up with two zips."

Overt Act Twenty

On July 18, 2015, at 12:07 p.m., Gerald Sentell told Joseph Ray Mendiola that he needed to talk to Mendiola about what happened to Destiny Stephenson.

Overt Act Twenty-One

On July 18, 2015 at 4:13 p.m., Joseph Ray Mendiola told Jeremy Hatch that he needed to call Gerald Sentell back and added "that's who he used to give it to" and explained to Hatch that Stephenson had just left Sentell's residence when she was stopped by the police.

Overt Act Twenty-Two

On July 19, 2015, at approximately 2:18 p.m., Joseph Ray Mendiola advised Susana Ceballos that he was finished with his stuff. Mendiola and Ceballos agreed to meet, and Mendiola asked Ceballos to "bring like the whole shipment from yesterday" with her and "bring like 12 more."

Overt Act Twenty-Three

On July 20, 2015, at 6:29 p.m., Joseph Ray Mendiola and Sergio Ureta-Castro agreed to meet so Ureta-Castro could deliver methamphetamine to Mendiola.

Overt Act Twenty-Four

On July 20, 2015, at 6:31 p.m., Jonathan Ureta-Lopez called Joseph Ray Mendiola to say his father, Sergio Ureta-Castro, would bring Mendiola two of them.

Overt Act Twenty-Five

On July 20, 2015, at 6:50 p.m., Joseph Ray Mendiola called Sergio Ureta-Castro to say the methamphetamine was almost two grams short and noted the weight was 112 grams with the baggie. Ureta-Castro said he would cover the shortage with the next delivery.

Overt Act Twenty-Six

On July 24, 2015, at 11:08 a.m., Susana Ceballos texted, "How much u got babe." At 11:22 a.m., Joseph Ray Mendiola replied, "Well I. Got 4 but need to collect from every buddy."

Overt Act Twenty-Seven

On July 24, 2015, Susana Ceballos and Joseph Ray Mendiola discussed paying for methamphetamine with the \$4,000 Mendiola had on hand and how it was cheaper to deal with this source of supply.

Overt Act Twenty-Eight

On July 25, 2015, at 12:33 p.m. and 12:40 p.m., Joseph Ray Mendiola and Alex LNU, using an interpreter, discussed working together directly and not going through Susana Ceballos because she was not answering calls and not paying Alex LNU money that Mendiola had given her, which amounted to \$13,700.

Overt Act Twenty-Nine

On July 25, 2015, Alex LNU told Joseph Ray Mendiola that Susana Ceballos had not paid the full \$16,000 for the two pounds of methamphetamine Alex LNU had sent her on July 17, 2015, and that she still owed \$6,000.

Overt Act Thirty

On July 25, 2015, Alex LNU told Joseph Ray Mendiola he would give a female, later identified as Ana Solis, Mendiola's number so she could contact Mendiola so Mendiola could

give the money for the drug delivery to Solis, who would in turn deliver the money to Alex LNU.

Overt Act Thirty-One

On July 25, 2015, at 3:15 p.m., Joseph Ray Mendiola and Ana Solis met at K-Mart, and Solis followed him to the home of another man where Solis called Alex LNU and explained that Mendiola was using his own money to pay what Susana Ceballos owed Alex LNU.

Overt Act Thirty-Two

On July 25, 2015, Alex LNU said the price would be \$8,000 per pound of methamphetamine, and he would have Ana Solis contact Joseph Ray Mendiola when the shipment arrived.

Overt Act Thirty-Three

On July 25, 2015, Ana Solis told Alex LNU that the last shipment was short 19 grams, and Alex LNU responded by saying he would replenish the amount that was short the next time.

Overt Act Thirty-Four

On July 25, 2015, Joseph Ray Mendiola explained to another man how Susana Ceballos had been telling him the price was \$7,000 per pound when in reality it was \$8,000 per pound and how Ceballos had not been passing along all of the money Mendiola had paid her.

Overt Act Thirty-Five

On July 25, 2015, at 4:33 p.m., Joseph Ray Mendiola called Francisco Fernando Aguilar-Larios who said he had "the pants" at the Whataburger in Roswell, and they arranged to meet there. Once at Whataburger, Mendiola told Aguilar that they should meet at the Comfort Suites because Mendiola had his scale there.

Overt Act Thirty-Six

On July 25, 2015, at 5:06 p.m., Joseph Ray Mendiola asked a female friend to travel to the Comfort Suites in fifteen minutes and subsequently asked her to bring some baggies with her.

Overt Act Thirty-Seven

On July 25, 2015, at 5:07 p.m., Joseph Ray Mendiola texted to Christopher Bernard Larez, "I got where u at."

Overt Act Thirty-Eight

On July 25, 2015, at 5:16 p.m., Joseph Ray Mendiola called Christopher Bernard Larez who said his friend was coming and needed the whole thing, just one though. Mendiola replied he had just been resupplied with methamphetamine and told Larez to go over to the Comfort Suites to get some stuff and make some money.

Overt Act Thirty-Nine

On July 25, 2015, at 9:16 p.m., Gerald Sentell informed Joseph Ray Mendiola he had money for Mendiola and asked if Mendiola had something. Mendiola affirmed, saying he was never out.

Overt Act Forty

On July 25, 2015, at 9:37 p.m., Joseph Ray Mendiola called Ana Solis and informed her that the methamphetamine he received from Alex LNU through Francisco Fernando Aguilar-Larios weighed 888 grams altogether and was short eight grams.

Overt Act Forty-One

On July 25, 2015, at 9:42 p.m., Ana Solis called Joseph Ray Mendiola to inform him that Alex LNU said not to worry about the missing eight grams because Alex LNU would account for the shortage in the next delivery. Solis said Alex LNU needed the \$2,000 from Mendiola so Alex LNU could send Mendiola more drugs.

Overt Act Forty-Two

On July 26, 2015, at 12:54 p.m., a man explained to Joseph Ray Mendiola that a woman they knew still had over \$1,000 of Mendiola's narcotics.

Overt Act Forty-Three

On July 26, 2015, at 2:01 p.m., Christopher Bernard Larez said he wanted to get another one from Joseph Ray Mendiola so he could sell both of them to some associates coming into town. Larez still had the one he got from Mendiola the day before and noted it was only a gram short.

Overt Act Forty-Four

On July 26, 2015, at 5:38 p.m., Cipriano Anaya said he would travel to Joseph Ray Mendiola's location. Mendiola said he had two ounces of methamphetamine for Anaya if that was enough. Anaya agreed.

Overt Act Forty-Five

On July 26, 2015, Cipriano Anaya drove from Albuquerque to Roswell to pick up two ounces of methamphetamine from Joseph Ray Mendiola. On, July 27, 2015, Anaya texted to Mendiola, "I made it home brother."

Overt Act Forty-Six

On July 26, 2015, at 5:59 p.m., a man said he was still selling the narcotics he got from Joseph Ray Mendiola, and they agreed to meet at the Comfort Suites after Mendiola told the man he had some good stuff for the man, some different stuff.

Overt Act Forty-Seven

On July 29, 2015, at 5:16 p.m., Ana Solis asked Joseph Ray Mendiola if it would be possible for him to get the money ready for a new shipment of methamphetamine that would be delivered to him the next day.

Overt Act Forty-Eight

On July 30, 2015, at 3:02 a.m., Joseph Ray Mendiola told Ty Livingston that he had four ounces of methamphetamine left and that he would send Jeremy Hatch to delivery three ounces to Livingston. Livingston told Mendiola that he would give him \$1,100 for the methamphetamine.

Overt Act Forty-Nine

On July 30, 2015, Ty Livingston told Joseph Ray Mendiola that he was selling five to six ounces of methamphetamine a day and had three or four ounces in his room. Mendiola told Livingston that he would obtain a couple of pounds of methamphetamine the following day.

Overt Act Fifty

On July 30, 2015, at 7:20 p.m., Ana Solis said Alex LNU asked if Joseph Ray Mendiola had the rest of the money ready. Mendiola replied that he had some of the money but would have all of it on the next day. Solis stated Alex LNU said that Mendiola could give the rest of the money to "that guy" (Francisco Fernando Aguilar-Larios) when he arrived to deliver the methamphetamine.

Overt Act Fifty-One

On July 31, 2015, at 12:55 p.m., Ty Livingston told Joseph Ray Mendiola that he had about \$4,000 and wanted to buy a large quantity of methamphetamine.

Overt Act Fifty-Two

On July 31, 2015, at 2:25 p.m., Joseph Ray Mendiola asked a man to give him some money so he could give it to the drug supplier who was already waiting on him in Roswell.

Overt Act Fifty-Three

On July 31, 2015, at 6:34 p.m., Joseph Ray Mendiola told another man that he would need money and asked to meet somewhere so he could collect money from the man to give to the drug supplier.

Overt Act Fifty-Four

On July 31, 2015, at approximately 8:35 p.m., Joseph Ray Mendiola drove to the southeast corner of the Taco Bell parking lot in Roswell to purchase methamphetamine from Francisco Fernando Aguilar-Larios.

In violation of 21 U.S.C. § 846.

Count 2

From on or about July 13, 2015, and continuing to on or about July 31, 2015, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **JOSEPH RAY MENDIOLA, ISMAEL MOLINA, and CHRISTOPHER BERNARD LAREZ**, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense against the United States, specifically, possession with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of cocaine, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

In furtherance of the conspiracy, and to accomplish the objectives of the conspiracy, the following acts, among others, were committed:

Overt Act One

On July 14, 2015, Joseph Ray Mendiola told Ismael Molina that "they" wanted cocaine straight off the brick, and they would pay extra if it was not diluted.

Overt Act Two

On July 17, 2015, at 11:20 p.m., Christopher Bernard Larez asked Joseph Ray Mendiola to bring him some different cocaine from what he gave him the other day.

Overt Act Three

On July 17, 2015, at 11:41 p.m., a man told Joseph Ray Mendiola that he wanted to buy some narcotics from him. Mendiola instructed the man to go over to Andy's house.

Overt Act Four

On July 21, 2015, Joseph Ray Mendiola and Ismael Molina exchanged a series of text messages from approximately 2:13 p.m. through 3:42 p.m., in which Molina indicated that his source of supply would meet with him in 30 minutes and asked Mendiola if "U still want me to get it if u just want the cash back." Mendiola replied "Get it but if I. Don't like it am giving it back to u." Molina later told Mendiola that he had it.

Overt Act Five

On July 21, 2015, Joseph Ray Mendiola spoke on the phone with another man who requested that Mendiola call him as soon as Mendiola got the cocaine he requested.

In violation of 21 U.S.C. § 846.

Count 3

On or about July 17, 2015, in Chaves County, in the District of New Mexico, the defendants, **GERALD SENTELL** and **DESTINY STEPHENSON**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B) and 18 U.S.C. § 2.

Count 4

On or about July 25, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA, FRANCISCO FERNANDO AGUILAR-LARIOS, SUSANA CEBALLOS, a.k.a. "Rita," and ANA SOLIS**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 5

On or about July 31, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA, FRANCISCO FERNANDO AGUILAR-LARIOS, and ANA SOLIS**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 6

On or about July 31, 2015, in Chaves County, in the District of New Mexico, the defendants, **RODNEY BOUGHTON, JAMES H. LEWIS, and STEPHANIE LEYBA**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 7

On or about July 31, 2015, in Chaves County, in the District of New Mexico, the defendants, **SERGIO URETA-CASTRO and JONATHAN URETA-LOPEZ**, unlawfully,

knowingly and intentionally possessed with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 8

On or about June 13, 2015, in Chaves County, in the District of New Mexico, the defendant, **GERALD SENTELL**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 9

On or about June 15, 2015, in Chaves County, in the District of New Mexico, the defendants, **GERALD SENTELL** and **RODNEY BOUGHTON**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 10

On or about July 16, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **JONATHAN URETA-LOPEZ**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 11

On or about July 17, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **LOUIS ESCOBAR**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 12

On or about July 17, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **SUSANA CEBALLOS**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 13

On or about July 19, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **SUSANA CEBALLOS**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 14

On or about July 20, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA**, **JONATHAN URETA-LOPEZ**, and **SERGIO**

URETA-CASTRO, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 15

On or about July 21, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **ISMAEL MOLINA**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 16

On or about July 24, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **SUSANA CEBALLOS**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 17

On or about July 25, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **ANA SOLIS**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 18

On or about July 25, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **FRANCISCO FERNANDO AGUILAR-LARIOS**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 19

On or about July 25, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **CHRISTOPHER BERNARD LAREZ**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 20

On or about July 25, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **CHRISTOPHER BERNARD LAREZ**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 21

On or about July 26, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **CIPRIANO ANAYA**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 22

On or about July 30, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **TY LIVINGSTON**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 23

On or about July 30, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **ANA SOLIS**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 24

On or about July 31, 2015, in Chaves County, in the District of New Mexico, the defendants, **JOSEPH RAY MENDIOLA** and **TY LIVINGSTON**, unlawfully, knowingly and

intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

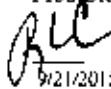
In violation of 21 U.S.C. § 843(b).

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY


Assistant United States Attorney



9/21/2015 3:26 PM